

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

GANDER MOUNTAIN COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 10-cv-02585-ADM/JJG
)	
)	
WORLD FINANCIAL NETWORK)	JURY TRIAL DEMANDED
NATIONAL BANK,)	
)	
Defendant.)	

**STIPULATED MOTION FOR AN EXTENSION OF
TIME TO FILE RESPONSIVE PLEADING**

Defendant Gander Mountain Company (“Gander Mountain”) hereby moves pursuant to Fed. R. Civ. P. (6)(b) for an extension of time to file a responsive pleading to World Financial’s First Amended Counterclaim. In support, Gander Mountain states:

1. On October 7, 2010, Defendant World Financial filed a First Amended Counterclaim. Gander Mountain’s responsive pleading to World Financial’s amended Counterclaim was thereafter due on Monday, October 25, 2010.
2. Federal Rule of Civil Procedure 6(b)(2) allows for an extension of time to for a responsive pleading for good cause and “on motion made after the time has expired if the party failed to act because of excusable neglect.”
3. On October 10, 2010, the brother of Gander Mountain’s counsel and his family were involved in a fatal car accident. Counsel’s brother sustained life threatening injuries in the accident and remained in a coma for nine days thereafter.

Counsel has been attending to her brother and his children since the accident. As such, Counsel for Gander Mountain was unable to attend to immediate work deadlines.

Counsel for Gander Mountain suggests that this family emergency constitutes both good cause and excusable neglect for her failure to file for an extension within the allotted time period.

4. On October 20, 2010, prior to the expiration of the time limit, counsel for Gander Mountain requested that World Financial consent to additional time in which Gander Mountain could file a responsive pleading to World Financial's amended counterclaim. Counsel for World Financial agreed to a three-week extension and Counsel's signature on this page indicates such stipulation.

5. Therefore, Gander Mountain respectfully requests an additional three weeks from October 25, 2010 in which to file a responsive pleading to World Financial's amended counterclaim, up to and including November 15, 2010.

WHEREFORE, Plaintiff Gander Mountain Company respectfully requests that this Court grant its Stipulated Motion for an Extension of Time and allow Gander Mountain up to and including November 15, 2010 in which to file a responsive pleading to World Financial's amended counterclaim.

Respectfully submitted,

Dated: October 27, 2010

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